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WASHINGTON, D.C. 20554

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IN THE MATTER OF

ADMINISTRATION OF THE
NORTH AMERICAN NUMBERING
PLAN

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CC DOCKET NO. 92-237

REPLY COMMENTS OF SOUTHWESTERN BELL CORPORATION
ON PHASE TWO

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JANUARY 27, 1993

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In the Matter of)
Administration of the) CC Docket No. 92-237
North American Numbering)
Plan)

REPLY COMMENTS OF SOUTHWESTERN BELL CORPORATION ON PHASE TWO

Southwestern Bell Corporation ("SBC") hereby submits these reply comments on Phase Two of the Commission's Notice of Inquiry relating to Carrier Identification Code ("CIC") expansion for Feature Group D access.

I. CIC EXPANSION SHOULD BE UNDERTAKEN AND ANY CHANGE IN THE PROCESS MUST BE ORDERED IMMEDIATELY.

While CIC expansion will be expensive, it should be undertaken to ensure that enough codes are available to route the traffic of existing and future carriers, as well as certain end user customers. The industry has agreed upon plans to expand the codes to four digits and is moving rapidly toward such implementation. If the Commission has any plans to halt or otherwise alter this process, it must announce such plans immediately so that the industry can react and implement any required changes on a timely basis.

II. LOCAL EXCHANGE CARRIERS SHOULD BE GIVEN SOME FLEXIBILITY IN DETERMINING THE LENGTH OF THEIR OWN PERIOD FOR IMPLEMENTING FOUR-DIGIT FEATURE GROUP D CIC CAPABILITY.

SBC believes that some latitude should be afforded in the implementation period for the four-digit Feature Group D

(FGD) CIC capability. Some LECs may want to implement the full four-digit CIC capability faster than others, based on their own individual networks, and should be allowed to do so. SBC suggests that the FCC establish a date specific of between twenty-four to thirty-six months for completing four-digit Feature Group D implementation. At the end of the period, all four-digit Feature Group D implementation should be completed.

III. A TWELVE YEAR PERMISSIVE DIALING PERIOD IS INAPPROPRIATE AND UNNECESSARY.

SBC supports adoption of as short a permissive dialing period as feasible allowing customers to reach the carrier of their choice by dialing either the three-digit CIC (10XXX) or the expanded four digit CIC (101XXXX), but only for a limited time period. After that time period, all Feature Group D customers will be required to dial four digits. SBC believes that the permissive dialing period should be for a period of approximately 18 months.

AT&T appears to suggest that the permissive period should be lengthened to as long as 12 years¹. SBC believes that a permissive dialing period of that length would be both unreasonable and unnecessary.

Lengthening the period will likely add to confusion of Feature Group D customers who, under AT&T's proposal, would be

¹AT&T Comments, pp. 8-9. AT&T also seems to imply (in Note 17) that extending the permissive dialing period could somehow reduce the costs of CIC expansion to customers. It is unclear, however, just how this cost reduction would occur.

required to dial different numbers for different types of carriers for many years. SBC believes that Feature Group D customers should be able to adjust to and become fully familiar with the new dialing format over a period of 18 months, and that nothing would be gained by extending the permissive period to 12 years.

Moreover, a permissive period of 12 years would serve to confer an unfair advantage on its proponent, AT&T. Such a period would allow AT&T's Feature Group D customers to continue to use the three-digit code for a significant period of time, while the Feature Group D customers of new carriers would be required to use the four-digit format. This dialing disparity could be a disadvantage for the new carrier, whose customers would have to dial more digits, particularly if the dialing disparity is continued for an extended period. Not surprisingly, few if any of the commenters, other than AT&T, have suggested that a 12 year permissive period would be appropriate or in the public interest. AT&T's proposal should be rejected.

IV. LOCAL EXCHANGE CARRIERS SHOULD BE GIVEN SOME LATITUDE IN DETERMINING THE LENGTH OF THEIR PERMISSIVE DIALING PERIODS.

The telecommunications industry has been unable to reach consensus on the length of the permissive dialing period. SBC believes that the LECs should also be given a certain amount of discretion in determining the length of their permissive dialing periods based upon their individual implementation schedules and technical capabilities. SBC suggests that the permissive dialing period begin upon implementation of expanded

FGD CICs by the LEC, and that it terminate no later than eighteen months after the end of the four-digit Feature Group D CIC implementation period established by the FCC. This would ensure that at some defined point there would be dialing parity for all end users and access customers on a nationwide basis.

V. CONCLUSION.

Any change in CIC expansion/implementation must be ordered immediately. SBC suggests a CIC four-digit Feature Group D implementation period with a specific date of between twenty-four to thirty-six months. Within that period, LECs should be allowed the discretion to determine their own implementation schedules for the Feature Group D four-digit CIC capability based on their own individual networks.

AT&T's proposed 12 year permissive dialing period is inappropriate and unnecessary. SBC suggests a permissive dialing period lasting no longer than 18 months from the end of the implementation period established by the FCC for the Feature Group D four-digit CIC capability.

Respectfully submitted,

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January 27, 1993

CERTIFICATE OF SERVICE

I, Mark P. Royer, hereby certify that copies of the foregoing Reply Comments of Southwestern Bell Corporation on Phase Two of CC Docket 92-237 have been served by First Class United States mail, postage prepaid, on the parties listed on the attached.


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